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Attorneys for Defendant: Otto Trucking LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

Courtroom: F, 15th Floor
Judge: Hon. Jacqueline S. Corley

Filed/Lodged Concurrently with:

1. Declaration ISO Admin. Mot. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this administrative motion for an order to file under seal portions of Otto Trucking’s Motion to Compel Discovery Re: Waymo’s Investigation and exhibits thereto (the “Administrative Motion”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Parties Claiming Confidentiality
Defendant Otto Trucking’s Motion to Compel	Highlighted portions	Plaintiff
Exhibit 2 to the Vu Declaration – excerpts of the rebuttal expert report of Paul French	Entire Document	Plaintiff
Exhibit 4 to the Vu Declaration—WAYMO-UBER-00086812	Entire document	Plaintiff
Exhibit 5 to the Vu Declaration—WAYMO-UBER-00086817	Entire document	Plaintiff
Exhibit 6 to the Vu Declaration—WAYMO-UBER-00086953	Entire document	Plaintiff
Exhibit 7 to the Vu Declaration—WAYMO-UBER-00086815	Entire document	Plaintiff
Exhibit 8 to the Vu Declaration—WAYMO-UBER-00084600	Entire document	Plaintiff
Exhibit 9 to the Vu Declaration—WAYMO-UBER-00086840	Entire document	Plaintiff
Exhibit 10 to the Vu Declaration—excerpts of the transcript for the deposition of Paul French dated October 3, 2017	Highlighted portions	Plaintiff

The highlighted portions of Otto Trucking’s Motion and Exhibit 10, as well as the entirety of Exhibits 2, 4–9 contain information that Plaintiff Waymo LLC (“Waymo”) has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order

1 in this case. Otto Trucking states no position about whether the confidentiality designations are
2 appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the
3 above information pursuant to Local Rule 79-5.

4 Otto Trucking's request to seal is narrowly tailored to those portions of the Administrative
5 Motion and its supporting documents that merit provisional sealing.

6
7 Dated: October 20, 2017

Respectfully submitted,

8 By: /s/ Neel Chatterjee

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16 *Attorneys for Defendant: Otto Trucking LLC*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 20, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **October 20, 2017**.

/s/ Neel Chatterjee
NEEL CHATTERJEE